



## Tennessee Department of Agriculture

### Policy Concerning the Disposal of Dead Farm Animals and The Disposal of Offal from Slaughter Facilities

Effective Date: May 15, 2009  
(Revised May 4, 2012)

#### Statement of Need and Purpose:

The death of farm animals is a normal and inevitable part of livestock production. Due to human health, nuisance and environmental concerns, it is necessary to provide this policy as guidance to producers who have questions as to the lawful disposal of deceased farm animals.

The slaughter of cattle, goats, deer etc. is performed by commercial slaughter facilities across Tennessee. The systematic disposal of the offal or non-edible by-products from these activities has historically been rendering. In addition to the existing USDA regulations that require the removal of specified risk materials (SRMS) in cattle 30 months of age and older processed for human food, recent changes in FDA federal regulations, specific to BSE concerns found in 21 CFR 589.2001, requires the additional removal of certain cattle material prohibited in animal feed (CMPAF) and will make the rendering of specific portions of the by-products utilized for all animal feed unlawful. Rendering companies have responded in various ways; from refusal to accept offal entirely to the imposition of requirements for waste separation and liability insurance requirements. This policy lists options for these commercial slaughter facilities.

#### **Disposal of Dead Farm Animals**

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Carcasses of farm animals meet the definition of a "solid waste" in the regulations of the Tennessee Department of Environment and Conservation, Division of Solid Waste Management (TDEC-SWM), found at <http://www.tennessee.gov/sos/rules/1200/1200-01/1200-01-07.20081126.pdf>. It is recommended that producers dispose of carcasses within 48 hours of discovery of the dead animal, regardless of weather conditions.

Therefore, owners of livestock have several options for dealing with dead farm animals. They are as follows:

**On-Farm Burial:** A livestock producer may bury his or her deceased livestock on their farm without permits from TDEC-SWM. According to TDEC rules, no permit is required for:

"Disposal of farming wastes at facilities which are on the site of generation and with a fill area of less than one acre in areal extent when completed..."

Burial should conform to the recommendations of the US Department of Agriculture-Natural Resources Conservation Service, Practice Code 316, found at:

[http://efotg.nrcs.usda.gov/references/public/TN/Emergency\\_Disposal\\_Animal\\_Mortality\\_TN316\\_Guide\\_Sheet.pdf](http://efotg.nrcs.usda.gov/references/public/TN/Emergency_Disposal_Animal_Mortality_TN316_Guide_Sheet.pdf)

Generally, a burial site should be:

- More than 300 feet from any well head,
- More than 165 feet from a property line or public use area,
- More than 100 feet from waters of the state or a wet weather conveyance,
- More than 2 feet above bedrock and the ground water table.

**Composting.** Producers may elect to compost their large animal mortalities on their farm. Follow USDA-NRCS technical guidance found in Conservation Practice Standard 317.

**Landfilling.** Producers may dispose of dead farm animals in Class I landfills in Tennessee. TDEC rules allow the disposal of dead animals into Class II and III landfills, but only with written permission from the Commissioner of TDEC.

**Burning.** Section 1200-3-4-.04 of TDEC-Air Pollution Control Rules provides various exceptions to the general ban on open burning. Specifically, Section 1200-3-4-.04(1)(f) allows for the burning of dead animals:

“Fires solely for the burning of bodies of dead animals, including poultry, where no other safe and/or practical disposal method exists. Priming materials used to facilitate such burning shall be limited to #1 or #2 grade fuel oils, vegetation grown on the property of the burn site, and wood waste, as defined in the rule.”

**Incineration.** Section 1200-03-09-.04(4)(d)11 of TDEC Air Pollution Control Rules provides an exemption from air quality permitting for all livestock (including poultry) incinerator equipment and associated fuel burning if the incineration unit has a manufacturer’s rated capacity less than 500 pounds per hour or a total burner rated capacity less than 400,000 Btu per hour; only livestock and poultry carcasses are charged into the unit (no other wastes or materials are allowed); and the incinerator is not a commercial unit.

**Rendering.** Rendering companies may offer on-farm service to pick up dead animals, but restrictions may be imposed by the renderer for dead cows that are 30 months of age or older.

#### **Catastrophic Losses:**

The State Veterinarian with the Tennessee Department of Agriculture should be notified when catastrophic losses are greater than 10,000 pounds. Landfilling, composting, or rendering may be the only options viable in the event of catastrophic livestock losses.

## **Disposal Options for Commercial Slaughter Facilities**

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### **Deer-Only Processing Facilities**

Since the new rules only restrict byproducts from cattle, no changes will be necessary for facilities that only process deer.

### **Cattle Slaughter and Processing Facilities**

Option 1. If you currently use a renderer for the disposal of the non-edible byproducts from your operation and your renderer certifies to you (in writing) that they do not process the byproducts into any animal feed, no changes to your operation are required.

Option 2. If you currently use a renderer for the disposal of the non-edible byproducts from your operation and your renderer has refused to accept any byproducts from your facility in the future, your option is disposal in a permitted landfill. Incineration or composting may also be options for disposal but approval from TDEC is necessary.

Option 3. If you currently use a renderer for the disposal of the non-edible byproducts from your operation and your renderer is willing to accept the non-restricted byproducts, then you must separate the restricted byproducts of the slaughtered cattle (brain and spinal cord) from the other offal. There are certification requirements on the slaughter facility and the renderer included in the new rules that must be followed. The restricted byproducts may be disposed in a permitted landfill. Incineration or composting may also be options for disposal but approval from TDEC is necessary. If the owner of the slaughtered cow also owns a farm, the restricted byproducts may be transferred back to him or her for on-farm disposal.

Option 4. If you slaughter cattle that are less than 30 months of age only, the renderer can agree to accept the non-edible byproducts from your operation based on this fact.

It is important to understand that all the non-edible byproducts of cattle slaughtering and processing can be taken by a renderer and used for other purposes. The new FDA rule restricts the rendering of CMPAF including brains and spinal cords of cattle older than 30 months into all animal feed.